

AUG 31 2011

## UNITED STATES DISTRICT COURT

for the

Eastern District of North Carolina

DENNIS P. JAVARONE, CLERK  
US DISTRICT COURT, EDNC  
BY DEB DEP CLK

United States of America

v.

Donald SCOTT, Jr.

*Defendant*

Case No.

7:11-mj-1193

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 08/23/2011 in the county of Robeson in the Eastern District of  
North Carolina, the defendant violated Title 21 U. S. C. § 841  
an offense described as follows:

Distribution of a controlled substance and possession with intent to manufacture, distribute or dispense a controlled  
substance

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

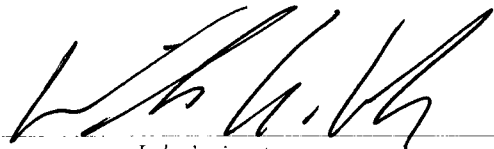
Complainant's signature

Christopher E. Brant, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

8/31/11

Judge's signature

City and state:

Raleigh, North Carolina

William A. Webb, United States Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION**

**AFFIDAVIT**

1. I, Christopher E. Brant, (hereinafter referred to as "affiant"), depose and state that I am a Special Agent (S/A) of the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), and have been so employed since November 27, 2006. I am currently assigned to the ICE Resident Agent in Charge Raleigh, North Carolina Field Office (RAC/Raleigh) and my duties include investigating violations of Titles 8, 18, 19, 21 and 31 of the United States Code (U.S.C). Prior to my reporting for assignment at RAC/Raleigh, I attended twenty-three (23) weeks of training at the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia, where I received instruction in Federal criminal statutes, search, seizure and arrest authority, and many other facets of law enforcement. Prior to attending FLETC, I worked five (5) years as an accountant for two (2) multi-billion dollar companies and obtained Undergraduate and Master's degrees in Business Administration and Finance.

2. This affidavit is made in support of a criminal complaint against Donald Scott, Jr. (SCOTT), where there is probable cause to believe SCOTT committed offenses involving the violation of Title 21, U.S.C., § 841(a)(1)<sup>1</sup>.

3. This Affidavit is based upon information obtained from other law enforcement officers, by reviewing law enforcement reports, and through personal involvement in this investigation. This affidavit does not set forth all information known to me about this investigation and is being submitted solely for the purpose of providing sufficient evidence to establish probable cause to believe SCOTT violated Title 21, U.S.C., § 841(a)(1).

4. As part of this investigation your affiant has determined the following information relative to SCOTT:

- a. SCOTT'S date of birth is February XX, 19XX
- b. SCOTT'S social security number is XXX-XX-XXXX

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<sup>1</sup> Title 21, U.S.C., § 841(a)(1) "Prohibited Acts" makes it a violation of law for any person to knowingly or intentionally manufacture, distribute or dispense, or possess with intent to manufacture, distribute or dispense a controlled substance.

- c. SCOTT'S residence is located at 8174 Gaddys Mill Road in Maxton, North Carolina
- d. SCOTT has no reportable wages according to the North Carolina Employment Security Commission

5. On or about August 23, 2011, an Informant, at the direction of SBI S/As, travelled to the SUBJECT PREMISES in order to purchase powder cocaine. The Informant was search before and after the transaction. While present at SCOTT'S residence, the Informant purchased approximately one (1) ounce of powder cocaine from SCOTT in exchange for \$1,200 in United States currency. The purchase was videotaped and revealed that SCOTT retrieved the powder cocaine from a large gun safe located within his bedroom at the SUBJECT PREMISES. SCOTT can clearly been seen on the videotape handing the cocaine to the Informant. The powder was field tested and was positive for the presence of cocaine.

### CONCLUSION

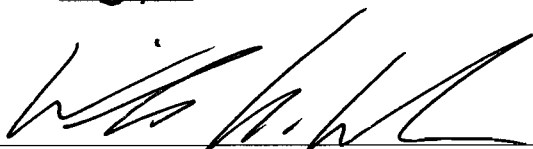
6. Based on the above information, your affiant believe there is ample probable cause to believe that Donald SCOTT, Jr. possessed cocaine with the intent to sale and/or distribute cocaine in violation of Title 21, U.S.C., § 841. Your affiant respectfully requests that this Court issue a warrant ordering SCOTT'S arrest for such violation.



Christopher E. Brant  
Special Agent  
Immigration and Customs Enforcement

SUBSCRIBED TO AND SWORN TO BEFORE ME

THIS 31<sup>st</sup> DAY OF AUGUST 2011.



William A. Webb  
United States Magistrate Judge  
Eastern District of North Carolina

